IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 11-01500/MCF

GILBERTO NEGRON FRANCESCHINI AMANDA ROCHE RODRIGUEZ

CHAPTER 13

DEBTORS

DEBTORS' REPLY TO AMENDED TRUSTEE'S UNFAVORABLE REPORT ON PROPOSED POST CONFIRMATION PLAN MODIFICATION, DOCKET NO. 90

TO THE HONORABLE COURT:

NOW COME, GILBERTO NEGRON FRANCESCHINI and AMANDA ROCHE RODRIGUEZ, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

- 1. The Chapter 13 Trustee filed an amended unfavorable report on proposed post confirmation Plan modification, docket no. 90, dated August 15, 2013.
- 2. On August 26, 2013, the debtors submitted evidence of being current in his Domestic Support Obligation to the Trustee, as requested.
- 4. With this information debtors respond to the Amended Trustee's Unfavorable Report on Proposed Post Confirmation Plan Modification, docket no. 90, dated August 15, 2013.

WHEREFORE debtors respectfully pray that amended Trustee's unfavorable recommendation be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service

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copy of this motion to the following participants: debtors, Gilberto Negron Franceschini and Amanda Roche Rodriguez, in the above captioned case.

RESPECFULLY SUBMITTED. In San Juan, Puerto Rico, this 26th day of August, 2013.

/s/ Roberto Figueroa Carrasquillo ROBERTO FIGUEROA CARRASQUILLO USDC #203614 PO BOX 186 CAGUAS PR 00726-0816 TEL (787)744-7699FAX (787)746-5294 EMAIL: rfigueroa@rfclawpr.com